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December 20, 2023

VIA ECF

Hon. Robert M. Levy
United States Magistrate Judge
United States District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Singer v. Bank of Palestine*, No. 19-cv-0006 (ENV)(RML)

Dear Judge Levy:

In accordance with the Court's docket order of October 24, 2023, we write on behalf of all parties to provide a further status report concerning the additional review of Tape 6 by the independent vendor, Forensic Risk Alliance ("FRA").

As discussed in the previous status report (ECF No. 116), FRA searched the data from Tape 6 using the search terms Plaintiffs requested, and identified 1,572 unique files in which an initial "hit" was found. FRA then recommended loading those files into a Relativity database for further review, to which the parties agreed. Plaintiffs provided to FRA a list of files with which Plaintiffs believed FRA should start its review. On October 13, FRA completed its review of the files Plaintiffs had identified to be reviewed first, and the parties then instructed FRA to produce a generalized search report for the transactions FRA had identified in that initial set of files.

On November 3, FRA provided the parties with a summary memorandum containing the information requested by the parties. The memorandum states that FRA "identified 1,046 transactions that contained one or more of the search terms used. None of these transactions occurred before August 19, 2003."

Upon review of FRA's memorandum, Plaintiffs wrote to BOP on November 30, requesting additional information, including clarifications concerning the account numbers previously provided and used in some of FRA's searches. BOP responded to the request for additional

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information on December 13 and on Monday, December 18, Plaintiffs sent BOP another email with multiple additional requests for information that Plaintiffs stated “should be resolved prior to initiating any further forensic work with FRA.” BOP is in the process of preparing a response to Plaintiffs’ requests, after which the parties will confer regarding any additional forensic work to be done by FRA.

The parties respectfully propose to submit a further status report no later than February 1, 2023.

Respectfully submitted,

Squire Patton Boggs (US) LLP

/s/ Gassan A. Baloul
Gassan A. Baloul